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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DIAMOND RESORTS U.S. COLLECTION
DEVELOPMENT, LLC, a Delaware Limited
Liability Company,

|Case No.: 2:17-cv-03007-APG-VCF

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINE TO
RESPOND TO SGB's MOTION TO
STRIKE [ECF #380]**

[First Request]

REED HEIN & ASSOCIATES, LLC d/b/a
TIMESHARE EXIT TEAM, a Washington
Limited Liability Company; BRANDON REED,
an individual and citizen of the State of
Washington; TREVOR HEIN, an individual and
citizen of Canada; THOMAS PARENTEAU, an

1 individual and citizen of the State of
 2 Washington; HAPPY HOUR MEDIA GROUP,
 3 LLC, a Washington Limited Liability Company;
 4 MITCHELL R. SUSSMAN, ESQ. d/b/a THE
 5 LAW OFFICES OF MITCHELL REED
 6 SUSSMAN & ASSOCIATES, an individual and
 7 citizen of the State of California; SCHROETER,
 8 GOLDMARK & BENDER, P.S., a Washington
 9 Professional Services Corporation; and KEN B.
 10 PRIVETT, ESQ., a citizen of the State of
 11 Oklahoma,
 12
 13 Defendants.

14 Pursuant to LR IA 6-1 and Fed. R. Civ. P. 6(b)(1)(A) ("FRCP"), Plaintiff Diamond
 15 Resorts U.S. Collection Development, LLC ("Diamond"), and Defendant Schroeter Goldmark &
 16 Bender, P.S. ("SGB") hereby stipulate to extend Diamond's Response to SGB's Motion to Strike
 17 [ECF 380] (the "Motion"), currently set for February 8, 2021, or a period of one (1) week,
 18 through February 15, 2021, and as grounds state as follows:

1. SGB Filed the Motion on January 25, 2021.
2. Between the filing of the Motion, and Diamond's present response deadline, Diamond was required to respond to Requests for Production from both SGB and Defendant Reed Hein & Associates, as well as respond to SGB's Interrogatories. In conjunction therewith, Diamond produced over 150,000 pages of documents.
3. In addition to the discovery responses, the parties have been engaged in ongoing meet and confer efforts regarding several other issues. Though the parties have been working diligently to resolve many of these issues, it is likely that the parties will seek the Court's intervention in the relatively near future.

23 4. In order to adequately respond to SGB's Motion, and the issues presented therein,
 24 the Diamond and SGB agree that Diamond's deadline to file its response should be extend one
 25 (1) week, up to and including February 15, 2021.

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1 5. This is the Parties' first request for extension of this deadline, and it is not
2 intended to cause any delay or prejudice to any party. Defendant does not object to the requested
3 extension.

4 Dated this 5th day of February, 2021.

5 GREENSPOON MARDER LLP

7 _____
8 /s/ *Phillip A. Silvestri, Esq.*
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13 Attorneys for Plaintiff
14 Diamond Resorts U.S. Collection
15 Development, LLC

6 LIPSON NEILSON, P.C.

7 _____
8 /s/ *Megan H. Thongham, Esq.*
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14 Las Vegas, NV 89144-7052

15 Attorneys for Defendant
16 Schroeter, Goldmark & Bender, P.S.

17 IT IS SO ORDERED

18 
19 _____
20 UNITED STATES DISTRICT JUDGE

21 DATED: February 8, 2021

22 GREENSPOON MARDER LLP
23 3993 Howard Hughes Parkway, Suite 400
24 Las Vegas, Nevada 89169
25 Phone: (702) 978-4249 Fax: (945) 333-4256

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system on this 5th day of December, 2021. I also certify that the foregoing document is being served this day on all counsel of record or *pro se* parties identified on the Court's Service List via transmission of Notices of Electronic Filing generated by CM/ECF. For any counsel or parties who are not authorized to receive Notices of Electronic Filing electronically, I certify that I served those parties via First Class U.S. Mail.

/s/ Phillip A. Silvestri
An employee of Greenspoon Marder LLP

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